

Hope A. Del Carlo, OSB No. 00241
Oregon Law Center
921 SW Washington, Suite 516
Portland, OR 97205
hdelcarlo@oregonlawcenter.org
Telephone: (503) 473-8319
Facsimile: (503) 295-0676

Mark E. Griffin, OSB No. 76152
R. Bradley Griffin, OSB No. 07239
Griffin & McCandlish
215 SW Washington St., Suite 202
Portland, OR 97202
mark@markgriffin.com
Telephone: (503) 224-2348
Facsimile: (503) 224-3634

Attorneys for Plaintiffs Justin James and Nicole James

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

JUSTIN JAMES and NICOLE JAMES;

Plaintiffs,

v.

FREMONT REORGANIZING
COMPANY, fka FREMONT
INVESTMENT & LOAN COMPANY,
a California corporation; BRIDGE
CAPITAL CORPORATION, a
California corporation; HSBC BANK
USA, NA, a national banking
association,

Defendants

Case No. CV-08-0397-BR

PLAINTIFFS' MOTION TO COMPEL
DISCOVERY FROM DEFENDANT
FREMONT REORGANIZING
COMPANY, fka FREMONT
INVESTMENT & LOAN COMPANY

Oral Argument Requested

L.R. 7.1 Certificate of Compliance:

Pursuant to L.R. 7.1, plaintiffs' attorney certifies that she has conferred via email and
Page 1 - PLAINTIFFS' MOTION TO COMPEL DISCOVERY FROM DEFENDANT
FREMONT REORGANIZING COMPANY, fka FREMONT INVESTMENT & LOAN
COMPANY

1 attempted to confer by telephone with counsel for defendant Fremont Reorganizing Corporation,
 2 fka Fremont Investment & Loan, about this Motion to Compel Discovery. The parties have been
 3 unable to resolve this discovery dispute informally.

4 Motion:

5 Pursuant to Fed. R. Civ. P. 37(a)(2) and (3), plaintiffs move the court for an order
 6 compelling defendant Fremont Reorganizing Corporation, fka Fremont Investment & Loan, to
 7 produce documents responsive to requests numbered 22, 23, and 24 in Plaintiffs' First Request
 8 for Production, specifically, requests numbered 22, 23 and 24. Plaintiffs ask that the Court order
 9 that documents be produced before the end of the current discovery deadline of December 21,
 10 2009.

11 In support of their motion plaintiffs offer the simultaneously-filed memorandum of law
 12 and the declaration of Hope Del Carlo. Plaintiffs request that oral argument be heard on this
 13 motion.

14 DATED this 30th day of November, 2009.

15 OREGON LAW CENTER

16 Hope A. Del Carlo

17 Hope A. Del Carlo, OSB No. 00241
 18 921 SW Washington St., Suite 516
 19 Portland, OR 97205
 20 Telephone: (503) 473-8319
 Facsimile: (503) 295-0676
 hdelcarlo@oregonlawcenter.org

21 —
 22 GRIFFIN AND McCANDLISH
 23 Mark E. Griffin, OSB No. 76152
 24 R. Bradley Griffin, OSB No. 07239
 Griffin & McCandlish
 25 215 SW Washington St, Suite 202
 26 Portland, OR 97202

Page 2 - PLAINTIFFS' MOTION TO COMPEL DISCOVERY FROM DEFENDANT
 FREMONT REORGANIZING COMPANY, fka FREMONT INVESTMENT & LOAN
 COMPANY

mark@markgriffin.com
brad@griffinmccandlish.com

Telephone: (503) 224-2348
Facsimile: (503) 224-3634

Of Attorneys for Plaintiffs

Page 3 - PLAINTIFFS' MOTION TO COMPEL DISCOVERY FROM DEFENDANT
FREMONT REORGANIZING COMPANY, fka FREMONT INVESTMENT & LOAN
COMPANY

OREGON LAW CENTER
921 SW Washington Street, Suite 516
Portland, Oregon 97205
Tel: 503/473-8319 Fax: 503/295-0676